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8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2011-520

13 **MARY ELIZABETH KIEFFER**  
14 **1377 Glenoaks Blvd., Apt. #305**  
15 **Glendale, CA 91201**  
16 **Registered Nurse License No. 213183**

**A C C U S A T I O N**

17 Respondent.

18 Complainant alleges:

**PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her  
20 official capacity as the Executive Officer of the Board of Registered Nursing, Department of  
21 Consumer Affairs.

22 2. On or about February 28, 1971, the Board of Registered Nursing issued Registered  
23 Nurse License Number 213183 to Mary Elizabeth Kieffer ("Respondent"). The Registered Nurse  
24 License was in full force and effect at all times relevant to the charges brought herein and will  
25 expire on February 28, 2011, unless renewed.

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4. Section 2750 of the Code provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with Code section 2750) of the Nursing Practice Act.

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1 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
2 enforcement of the case.

3 **FIRST CAUSE FOR DISCIPLINE**

4 **(Disciplinary Action by the Texas State Board of Nursing)**

5 9. Respondent is subject to disciplinary action under Code section 2761, subdivision  
6 (a)(4), on the grounds of unprofessional conduct in that Respondent was disciplined by the Board  
7 of Nurse Examiners for the State of Texas ("Texas Board").

8 10. On or about May 18, 2005, pursuant to the Agreed Order adopted by the Texas  
9 Board, in the disciplinary action entitled *In the Matter of Registered Nurse License Number*  
10 *686232 issued to Mary Elizabeth Kieffer*, the Texas Board having received sufficient evidence to  
11 take disciplinary action against Respondent's professional nursing license, accepted the voluntary  
12 surrender of said license.

13 **SECOND CAUSE FOR DISCIPLINE**

14 **(Unprofessional Conduct)**

15 11. Respondent is subject to disciplinary action under Code section 2761, subdivision  
16 (a), in that Respondent committed acts of unprofessional conduct. The conduct is more  
17 particularly described in paragraph 10 above, and herein incorporated by reference.

18 **PRAYER**

19 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
20 and that following the hearing, the Board of Registered Nursing issue a decision:

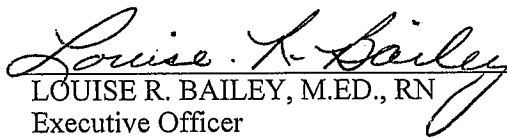
21 1. Revoking or suspending Registered Nurse License Number 213183, issued to Mary  
22 Elizabeth Kieffer;

23 2. Ordering Mary Elizabeth Kieffer to pay the Board of Registered Nursing the  
24 reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
25 Professions Code section 125.3;

26 3. Taking such other and further action as deemed necessary and proper.  
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DATED: December 13, 2010

  
LOUISE R. BAILEY, M.ED., RN  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
*Complainant*

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